November 3, 1993

Docket No. 50-293

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Mr. E. Thomas Boulette, Ph.D
Senior Vice President - Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

Dear Mr. Boulette:

SUBJECT: ISSUANCE OF AMENDMENT NO. 150 TO FACILITY OPERATING LICENSE NO. DPR-35, PILGRIM NUCLEAR POWER STATION (TAC NO. M86673)

The Commission has issued the enclosed Amendment No. 150 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station. This amendment is in response to your application dated May 20, 1993.

This amendment reduces the main steam isolation valve low turbine inlet pressure setpoint from greater than or equal to 880 pounds per square inch gage (psig) to greater then or equal to 810 psig, and reduces the minimum pressure in the definition of RUN mode from 880 psig to 785 psig.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register Notice.

Sincerely,

Original signed by:
Ronald B. Eaton, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 150 to License No. DPR-35
2. Safety Evaluation

cc w/enclosures:
See next page

w/corrections to SE

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 3, 1993

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Senior Vice President - Nuclear
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   License No. DPR-35
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See next page

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

BOSTON EDISON COMPANY

DOCKET NO. 50-293

PILGRIM NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 150
License No. DPR-35

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:

   A. The application for amendment filed by the Boston Edison Company (the licensee) dated May 20 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-35 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 150, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler

Walter R. Butler, Director
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 3, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 150

FACILITY OPERATING LICENSE NO. DPR-35

DOCKET NO. 50-293

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

Remove	Insert
3	3
37	37
38	38
45	45
70	70

valve closure, are bypassed when reactor pressure is less than 600 psig, the low pressure main steam line isolation valve closure trip is bypassed, the reactor protection system is energized with IRM neutron monitoring system trips and control rod withdrawal interlocks in service.

2. Run Mode - In this mode the reactor system pressure is at or above 785 psig and the reactor protection system is energized with APRM protection and RBM interlocks in service.

3. Shutdown Mode - The reactor is in the shutdown mode when the reactor mode switch is in the shutdown mode position and no core alterations are being performed.

   a. Hot Shutdown means conditions as above with reactor coolant temperature greater than 212 F.

   b. Cold Shutdown means conditions as above with reactor coolant temperature equal to or less than 212 F.

4. Refuel Mode - The reactor is in the refuel mode when the mode switch is in the refuel mode position. When the mode switch is in the refuel position, the refueling interlocks are in service.

L. Design Power - Design power means a steady-state power level of 1998 thermal megawatts.

M. Primary Containment Integrity - Primary containment integrity means that the drywell and pressure suppression chamber are intact and all of the following conditions are satisfied:

1. All manual containment isolation valves on lines connected to the reactor coolant system or containment which are not required to be open during accident conditions are closed.

2. At least one door in each airlock is closed and sealed.

3. All blind flanges and manways are closed.

4. All automatic primary containment isolation valves are operable or at least one containment isolation valve in each line having an inoperable valve shall be deactivated in the isolated condition.

5. All containment isolation check valves are operable or at least one containment valve in each line having an inoperable valve is secured in the isolated position.

N. Secondary Containment Integrity - Secondary containment integrity means that the reactor building is intact and the following conditions are met:

3.1 BASES (Cont'd)

level, the rate of power rise is no more than five percent of rated power per minute, and the APRM system would be more than adequate to assure a scram before power could exceed the safety limit. The 15% APRM scram remains active until the mode switch is placed in the RUN position.

The analysis to support operation at various power and flow relationships has considered operation with two recirculation pumps.

Intermediate Range Monitor (IRM)

The IRM system consists of 8 chambers, 4 in each of the reactor protection system logic channels. The IRM is a 5-decade instrument which covers the range of power level between that covered by the SRM and the APRM. The 5 decades are covered by the IRM by means of a range switch and the 5 decades are broken down into 10 ranges, each being one-half of a decade in size.

The IRM scram setting of 120/125 of full scale is active in each range of the IRM. For example, if the instrument were on Range 1, the scram setting would be a 120/125 of full scale for that range; likewise, if the instrument were on Range 5, the scram would be 120/125 of full scale on that range. Thus, as the IRM is ranged up to accommodate the increase in power level, the scram setting is also ranged up. The most significant sources of reactivity change during the power increase are due to control rod withdrawal. For in-sequence control rod withdrawal, the rate of change of power is slow enough due to the physical limitation of withdrawing control rods that heat flux is in equilibrium with the neutron flux, and an IRM scram would result in a reactor shutdown well before any safety limit is exceeded.

In order to ensure that the IRM provided adequate protection against the single rod withdrawal error, a range of rod withdrawal accidents was analyzed. This analysis included starting the accident at various power levels. The most severe case involves an initial condition in which the reactor is just subcritical and the IRM system is not yet on scale. This condition exists at quarter rod density. Additional conservatism was taken in this analysis by assuming that the IRM channel closest to the withdrawn rod is bypassed. The results of this analysis show that the reactor is scrammed and peak core power limited to one percent of rated power, thus maintaining MCPR above the safety limit MCPR. Based on the above analysis, the IRM provides protection against local control rod withdrawal errors and continuous withdrawal of control rods in sequence and provides backup protection for the APRM.

Reactor Low Water Level

The setpoint for low level scram is above the bottom of the separator skirt. This level has been used in transient analyses dealing with coolant inventory decrease. The results show that scram at this level properly protects the fuel and the pressure barrier, because MCPR

3.1 BASES (Cont'd)

remains well above the safety limit MCPR in all cases, and system pressure does not reach the safety valve settings. The scram setting is approximately 15 inches below the normal operating range and is thus sufficient to avoid spurious scrams.

Turbine Stop Valve Closure

The turbine stop valve closure scram anticipates the pressure, neutron flux, and heat flux increase that could result from rapid closure of the turbine stop valves. With a scram trip setting of $\leq$ 10 percent of valve closure from full open, the resultant increase in surface heat flux is limited such that MCPR remains above the safety limit MCPR even during the worst case transient that assumes the turbine bypass is closed.

Turbine Control Valve Fast Closure

The turbine control valve fast closure scram anticipates the pressure, neutron flux, and heat flux increase that could result from fast closure of the turbine control valves due to load rejection exceeding the capability of the bypass valves. The reactor protection system initiates a scram when fast closure of the control valves is initiated by the acceleration relay. This setting and the fact that control valve closure time is approximately twice as long as that for the stop valves means that resulting transients, while similar, are less severe than for stop valve closure. MCPR remains above the safety limit MCPR.

Main Condenser Low Vacuum

To protect the main condenser against overpressure, a loss of condenser vacuum initiates automatic closure of the turbine stop valves and turbine bypass valves. To anticipate the transient and automatic scram resulting from the closure of the turbine stop valves, low condenser vacuum initiates a scram. The low vacuum scram setpoint is selected to initiate a scram before the closure of the turbine stop valves is initiated.

Main Steam Line Isolation Valve Closure

The low pressure isolation of the main steam lines at 810 psig (as specified in Table 3.2.A) was provided to protect against rapid reactor depressurization and the resulting rapid cooldown of the vessel. Advantage is taken of the scram feature that occurs when the main steam line isolation valves are closed, to provide for reactor shutdown so that high power operation at low reactor pressure does not occur, thus providing protection for the fuel cladding integrity safety limit. Operation of the reactor at pressures lower than 785 psig requires the reactor mode switch be in the startup position where protection of the fuel cladding integrity safety limit is provided by the IRM high neutron flux scram and APRM 15% scram. Thus, the combination of main steam line low pressure isolation and isolation valve closure scram assures the availability of neutron flux scram protection over the entire

PNPS TABLE 3.2.A

INSTRUMENTATION THAT INITIATES PRIMARY CONTAINMENT ISOLATION

Operable Instrument Channels Per Trip System (1)				
Minimum	Available	Instrument	Trip Level Setting	Action (2)
2(7)	2	Reactor Low Water Level	≥9" indicated level (3)	A and D
1	1	Reactor High Pressure	≤110 psig	D
2	2	Reactor Low-Low Water Level	at or above -49 in. indicated level (4)	A
2	2	Reactor High Water Level	≤48" indicated level (5)	B
2(7)	2	High Drywell Pressure	≤2.5 psig	A
2	2	High Radiation Main Steam Line Tunnel (9)	≤7 times normal rated full power background	B
2	2	Low Pressure Main Steam Line	≥810 psig (8)	B
2(6)	2	High Flow Main Steam Line	≤140% of rated steam flow	B
2	2	Main Steam Line Tunnel Exhaust Duct High Temperature	≤170^{o}F	B
2	2	Turbine Basement Exhaust Duct High Temperature	≤150^{o}F	B
1	1	Reactor Cleanup System High Flow	≤300% of rated flow	C
2	2	Reactor Cleanup System High Temperature	≤150^{o}F	C

3.2 BASES (Cont'd)

dent. With the established setting of 7 times normal background, and main steam line isolation valve closure, fission product release is limited so that 10 CFR 100 guidelines are not exceeded for this accident. Reference FSAR Section 14.5.1 and Appendix R.3.2.5.

Pressure instrumentation is provided to close the main steam isolation valves in RUN mode before the reactor pressure drops below 785 psig. This function is primarily intended to prevent excessive vessel depressurization in the event of a malfunction of the nuclear system pressure regulator. This function also provides automatic protection of the low-pressure core-thermal-power safety limit (25% of rated core thermal power for reactor pressure < 785 psig). In the Refuel or Startup Mode, the inventory loss associated with such a malfunction would be limited by closure of the Main Steam Isolation Valves due to either high or low reactor water level; no fuel would be uncovered. This function is not required to satisfy any safety design bases.

The HPCI high flow and temperature instrumentation are provided to detect a break in the HPCI steam piping. Tripping of this instrumentation results in actuation of HPCI isolation valves. Tripping logic for the high flow is a 1 out of 2 logic, and all sensors are required to be operable.

Temperature is monitored at three (3) locations with four (4) temperature sensors at each location. Two (2) sensors at each location are powered by "A" direct current control bus and two (2) by "B" direct current control bus. Each pair of sensors, e.g., "A" or "B", at each location are physically separated and the tripping of either "A" or "B" bus sensor will actuate HPCI isolation valves.

The trip settings of $\leq$ 300% of design flow for high flow and 200°F or 170°F, depending on sensor location, for high temperature are such that core uncovery is prevented and fission product release is within limits.

The RCIC high flow and temperature instrumentation are arranged the same as that for the HPCI. The trip setting of $\leq$ 300% for high flow and 200°F, 170°F and 150°F, depending on sensor location, for temperature are based on the same criteria as the HPCI.

The Reactor Water Cleanup System high flow and temperature instrumentation are arranged similar as that for the HPCI. The trip settings are such that core uncovery is prevented and fission product release is within limits.

The instrumentation which initiates CSCS action is arranged in a dual bus system. As for other vital instrumentation arranged in this fashion, the Specification preserves the effectiveness of the system even during periods when maintenance or testing is being performed. An exception to this is when logic functional testing is being performed.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 150 TO FACILITY OPERATING LICENSE NO. DPR-35

BOSTON EDISON COMPANY

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 INTRODUCTION

By letter dated May 20, 1993, the Boston Edison Company (BECO) proposed to change the Pilgrim Nuclear Power Station (PNPS) Appendix A of Operating License No. DRP-35 in accordance with 10 CFR 50.90 (Ref.1). One proposed change to the Technical Specification (TS) reduces the main steam isolation valve low turbine inlet pressure (MSIVLTIP) setpoint from equal to or greater than 880 pounds per square inch gauge (psig) to equal or greater than 810 psig. This change is proposed to reduce potential spurious isolation caused by the existing higher setpoint.

The other TS change proposed is to reduce the minimum pressure in the definition of RUN mode from 880 psig to 785 psig. This change is proposed to realize fully the potential of enhanced operating flexibility provided by the proposed reduction in the MSIVLTIP.

2.0 BACKGROUND

The main steam isolation valve (MSIV) low-pressure isolation setpoint is part of the primary containment and reactor vessel isolation system. It provides isolation in response to pressure regulator malfunction to ensure that:

- o Radiological release to environs is less than the maximum allowed,
- o Thermal stress, due to excessive reactor vessel depressurization, is acceptable,
- o Minimum Critical Power Ratio is acceptable,
- o Bulk reactor water swell does not affect safety relief valves performance,
- o Low-Pressure Core Thermal Power Safety Limit is acceptable.

The reactor mode switch is used to select the necessary scram functions for various plant conditions and to provide the necessary scram bypasses to facilitate operations. The initial setting of the low-pressure MSIV isolation was 100 psi less than the turbine inlet pressure. With this 100 psi or less operating margin, unwanted isolation and scrams could occur since pressure regulators with built-in control time constants may not be able to limit the pressure drop before the isolation setpoint is reached. The new setpoint could reduce the number of spurious scrams and unwanted MSIV isolation, consequently improving plant availability. The reduction of spurious scrams increases safety because there is a potential reduction of stress upon operators and equipment.

3.0 EVALUATION

The aspects of this modification and TS change that must be analyzed is as follows:

- Radiological Release
- Thermal Stress
- Minimum Critical Power Ratio
- Bulk Reactor Water Swell
- Low-Pressure Core Thermal Power Safety Limit

Radiological Release

While the MSIVLTIP can cause isolation of the reactor vessel and primary containment with the closure of the MSIVs, no credit is taken for this trip in the assessment of radiological releases. For a design basis steam line break, the MSIVs are closed by a high steam line flow control logic. Small steam line breaks are detected by either high radiation in the steam tunnel or high temperature in the turbine building which also causes the MSIVs to close.

Thermal Stress

Should the nuclear system pressure regulator fail open, the MSIVLTIP setpoint prevents excessive vessel depressurization which, if not terminated, could impose significant thermal stresses on the nuclear system process barrier and result in an increase in the nuclear system process barrier lifetime fatigue usage factor. According to the General Electric Company (GE) Topical Report NEDO 31296 (Ref. 2), and BECO's calculation I-N1-30, which used a low-pressure analytical limit of 750 psig, changing the MSIVLTIP setpoint from equal to or less than 880 psig to 810 psig does not significantly increase the lifetime fatigue usage factor assuming eight pressure regulator failure (open) events. The effects of increased core flow combined with this fatigue analysis were evaluated and determined to be insignificant.

Minimum Critical Power Ratio

NEDO 31296 analysis indicates that if the nuclear system pressure regulator fails open, assuming turbine control valves (TCVs) opening instantaneously upon failure of the pressure regulator, the lower MSIVLTIP setpoint will cause a delay in MSIVs closure but there will be no impact on the minimum critical power ratio (MCPR) because that setpoint is not near the safety limit. The voiding resulting by the opening of the turbine valves will cause a reduction in power level and the swell will cause a high-level turbine trip.

Bulk Reactor Water Swell

Reducing the MSIVLTIP setpoint would result in extending the depressurization time prior to MSIV isolation and cause greater bulk water swell. GE's analysis MDE-70-0586 (Ref. 3) of this event (pressure regulator failure [open] transient) using a bounding set of initial conditions chosen to maximize the severity of the water swell (2% power with 30% flow), indicates that high reactor water level initiates a turbine trip and feedwater pump trip (no credit is taken for a feedwater pump trip because this trip is not qualified as safety grade). Steam continues to be bypassed to the condenser until the MSIVLTIP setpoint is reached which causes the MSIV to close and cause a reactor trip. During the transient, the water level does not reach the bottom of the steam line nozzle elevation and hence no liquid will be trapped in the steam lines as a result of MSIV closure. Therefore, the safety relief valves would not be required to discharge high pressure liquid or two phase flow.

Low-Pressure Core Thermal Power Safety Limit

Although the MSIVLTIP setpoint is lowered to 810 psig, the automatic protection of the low-pressure core thermal power safety limit, which is equal to or less than 25% of rated thermal power, will remain functional.

Reactor Mode Switch

Reactor modes are determined by the position of the mode switch. The safety function of the mode switch is to select the necessary scram functions for various plant conditions. The mode switch also provides necessary bypasses to facilitate operation. The licensee proposes to reduce the minimum pressure in the definition of RUN mode from 880 psig to 785 psig. This change in the minimum pressure for the RUN mode does not affect any of the scram functions. Specifically, the scram on high flux at less than 25% power (mode switch in STARTUP) will not be bypassed before 785 psig is exceeded. This pressure is the minimum pressure for using the minimum critical power ratio (MCPR) as the basis for fuel cladding protection.

4.0 CONCLUSION

Based on the results of the various analyses, the staff finds the licensee's proposed changes to the technical specifications acceptable.

5.0 REFERENCES

1.0 Letter from E.T. Boulette, Senior Vice President - Nuclear, BECO to NRC, "Proposed Change to Technical Specification: Main Steam Isolation Valve Turbine Inlet Low-Pressure Setpoint" dated May 20, 1993.

2.0 General Electric Report NEDO-31296, "Safety Evaluation of MSIV Low Turbine Inlet Pressure Isolation Setpoint Change for Pilgrim Nuclear Power Station" dated May 1986.

3.0 General Electric Report MDE-70-0586, "Evaluation of the Effect on Plant Operation of MSIV Low Turbine Inlet Pressure Isolation Setpoint Change at Pilgrim Nuclear Power Station" dated July 1986.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Massachusetts State official was notified of the proposed issuance of the amendment. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (58 FR 36425). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

8.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: F. Paulitz

Date: November 3, 1993